

APR 19 2006

RECEIVED  
FEDERAL ELECTION  
COMMISSION  
SECRETARIAT

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

2006 APR 19 P 4:04

Pro-Life Campaign Committee and  
Pablo Gersten, in his official capacity  
as treasurer

MUR 5616

**SENSITIVE**

GENERAL COUNSEL'S REPORT #3

**I. ACTIONS RECOMMENDED:**

Accept the attached conciliation agreement with Pro-Life Campaign Committee and Pablo Gersten, in his official capacity as treasurer ("Respondents"), and close the file in this matter.

**II. BACKGROUND**

Attached is a signed conciliation agreement, settling violations of 2 U.S.C. §§ 434(a)(4)(A)(i) and (iv) and 434(b)(2) and (4) in connection with the Respondents' untimely filings of five disclosure reports during 2001 and 2002, which were late from periods ranging from four months to a year and a half, and their failure to disclose millions of dollars of receipts and disbursements, mostly funds raised by, and disbursed to, a telemarketing vendor, in their initial 2001 Mid-Year and 2001 Year-End Reports and their 2002 April and July Quarterly Reports. Attachment 1. Respondents have agreed to a civil penalty of \$150,000, approximately two-thirds of which it has already paid.

**III. DISCUSSION**

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Based on the above, this Office recommends that the Commission accept the attached signed conciliation agreement with Pro-Life Campaign Committee and Pablo Gersten, in his official capacity as treasurer, and close the file.

**IV. RECOMMENDATIONS**

1. Accept the attached conciliation agreement with Pro-Life Campaign Committee and Pablo Gersten, in his official capacity as treasurer.
2. Close the file.

3. Approve the appropriate letter.

Lawrence H. Norton  
General Counsel

Date

4/15/06

BY:

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Attachment  
Conciliation Agreement

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